

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBBIN CROSKEY,

Defendant.

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Case No: 4:11CR196 JCH

MOTION TO TRAVEL WHILE ON BOND

COMES NOW Defendant Robbin Croskey, by and through her attorney Henry M. Miller, and hereby requests permission from the Court to travel while on bond. In support of this motion, Defendant states as follows:

1. Defendant is requesting permission to travel to her family's home in Parlin, New Jersey from July 19 through July 27 to see her children and family, then to Atlanta, Georgia, from July 27 through and including August 1, 2012.
2. Defendant has requested and been granted similar travel before, however reports to the undersigned that circumstances have kept her from being able to engage in that previously allowed travel.
3. Defendant intends to travel by car, and will be able to be reached by cell phone. Her cell phone number as well as the addresses of her family home in New Jersey and her home in Atlanta have been provided to Pretrial Services.
4. It is the understanding of the undersigned that as a condition of her bond, Defendant is wearing a GPS tracking device, which will allow the court to monitor her movements during her travels.

5. Defendant will, of course, comply with any conditions the court imposes on this request.

WHEREFORE, Defendant requests this Court grant her leave to as stated above, while on bond and requests additionally such other and further relief as the Court deems appropriate the circumstances.

Respectfully submitted,

/s/ Henry M. Miller

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Certificate of Service

I hereby certify that on July 18, 2012, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ken Tihen and Tiffany Becker, Assistant United States Attorneys.

/s/ Henry M. Miller